

**From:** Trujillo, Rita, NMENV  
**To:** Norem, Nancy  
**Cc:** Kim, Gi-Dong, NMENV; Mustafa, Sufi A., NMENV; Uhl, Mary, NMENV; Kuehn, Elizabeth, NMENV  
**Subject:** FW: Comments on the BART modeling report for the San Juan Generating Station  
**Date:** Monday, July 30, 2007 2:07:41 PM

---

Nancy -

Here is a comment on the PNM BART analysis from Gi-Dong Kim. Gi-Dong is the dispersion modeler who has been assigned to review the analysis.

Rita

---

From: Kim, Gi-Dong, NMENV  
Sent: Monday, July 30, 2007 2:00 PM  
To: Trujillo, Rita, NMENV  
Cc: Mustafa, Sufi A., NMENV  
Subject: Comments on the BART modeling report for the San Juan Generating Station

Nancy,

In the process of reviewing the BART modeling report for the San Juan Generating Station, I found a serious flaw in the analysis. It is the use of average visibility improvements to determine cost effectiveness of the SCR and Hybrid technologies. The Regional Haze Rule requires visibility improvements at each and every wilderness area, not average regional improvement. It is obvious from looking at the tables in the report that the lesser improvements at further out wilderness areas is washing out significant improvements at places closer in such as Mesa Verde and San Pedro Parks. PNM must not use the fact that it is impacting 16 wilderness areas to prorate the cost of visibility improvements. At the very least they should be basing cost effectiveness on the maximum impact reduction at a single Class 1 area. If you have any comment, please let me know.

Gi-Dong

\*\*\*\*\*

Gi-Dong Kim  
Air Quality Bureau  
New Mexico Environment Department  
2044 Galisteo Street  
Santa Fe, NM 87505  
Tel: (505) 955-8023  
Fax: (505) 827-1543

Email: gi-dong.kim@state.nm.us

\*\*\*\*\*